

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KENNETH M. KRYS and CHRISTOPHER STRIDE, as Joint Official Liquidators of Sphinx, Ltd.,

Plaintiffs,

-vs.-

CHRISTOPHER SUGRUE, et al.,

Defendants.

No. 08-Civ. 3065 (GEL)  
No. 08-Civ. 3086 (GEL)

**MOTION TO ADMIT  
ALAN C. THOMAS,  
PRO HAC VICE**



PURSUANT TO LOCAL RULE 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern District of New York, I, Aaron E. Albert, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

ALAN C. THOMAS  
Fischer Porter Thomas & Reinfeld, P.C.  
180 Sylvan Avenue, Second Floor  
Englewood Cliffs, NJ 07632-2700  
Tel: (201) 569-5959  
Fax: (201) 871-4544

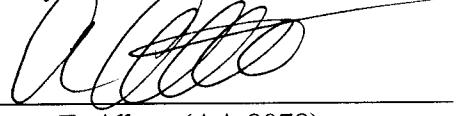
Alan C. Thomas is a member in good standing of the bar of the State of New Jersey and is admitted to practice in the United States District Court for the District of New Jersey. Mr. Thomas is also admitted to practice before the United States Courts of Appeals for the Third and Fourth Circuits.

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There are no pending disciplinary proceedings against Alan C. Thomas in any State or Federal court.

Respectfully submitted,

By:   
Aaron E. Albert (AA 8078)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KENNETH M. KRYS and CHRISTOPHER STRIDE, as Joint Official Liquidators of Sphinx, Ltd.,

Plaintiffs,

-vs.-

CHRISTOPHER SUGRUE, et al.,

Defendants.

No. 08-Civ. 3065 (GEL)  
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**AFFIDAVIT OF AARON E.  
ALBERT IN SUPPORT OF  
MOTION TO ADMIT  
ALAN C. THOMAS  
*PRO HAC VICE***

State of New Jersey )  
                        ) SS:  
County of Bergen   )

AARON E. ALBERT, being duly sworn, hereby deposes and says:

1. I am an associate attorney of the law firm of Fischer Porter Thomas & Reinfeld, P.C., attorneys for Defendants Beckenham Trading Company, Inc. and Andrew Krieger in the above-captioned matter. As such, I am familiar with the proceedings in this matter. I make this statement based on my personal knowledge of the facts set forth herein and in support of said defendants' motion to admit Alan C. Thomas as counsel *pro hac vice* to represent said defendants in this matter.

2. I am a member in good standing of the bars of the States of New York and New Jersey, and was admitted to practice law in New York on January 24, 2006 and in New Jersey on March 8, 2006. I am also admitted to the bar of the United States District Courts for the Southern District of New York, and am in good standing with this Court.

3. I have known Alan C. Thomas since January 2006.

4. Mr. Thomas is a partner of Fischer Porter Thomas & Reinfeld, P.C.

5. I know Mr. Thomas to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Mr. Thomas is a member in good standing of the bar of the State of New Jersey. A certificate of good standing is attached hereto as **Exhibit A**.

7. Accordingly, I am pleased to move this Court for the admission of Alan C. Thomas, *pro hac vice*.

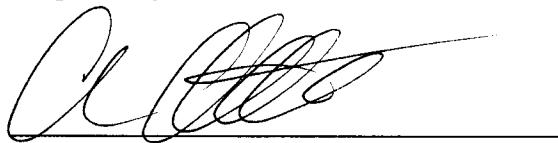
8. I respectfully submit a proposed order granting the admission of Alan C. Thomas, *pro hac vice*, which is enclosed herewith.

WHEREFORE, it is respectfully requested that the motion to admit Alan C. Thomas, *pro hac vice*, to represent Defendants Beckenham Trading Company, Inc. and Andrew Krieger in the above-captioned matter be granted.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

Dated: May 23, 2008  
Englewood Cliffs, New Jersey



Aaron E. Albert (AA 8078)  
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**CERTIFICATE OF SERVICE**

I, Aaron E. Albert, an attorney, hereby certify that on May 23, 2008, I caused the foregoing Motion for Admission Pro Hac Vice of Alan C. Thomas by Defendants Beckenham Trading Co., Inc. and Andrew Krieger to be served by regular mail:

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United States District Court  
Southern District of New York  
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New York, NY 10007-1312

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Brian Owens 2 Beresford Green Griffith Avenue Dublin 9, Ireland	HUGHES HUBBARD & REED LLP  David W. Wiltenburg One Battery Park Plaza New York, NY 10004  <i>Counsel to Defendant PricewaterhouseCoopers Cayman Islands</i>
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KATTEN MUCHIN ROSENMAN LLP  Helen B. Kim, Esq. 2029 Century Park East Suite 2600 Los Angeles, California 90067-3012  <i>Counsel to Defendant Dennis Klejna</i>	Thomas Hackl 150 Central Park South New York, NY 10019

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WILLIAMS MONTGOMERY & JOHN LTD.  Peter C. John Eric Richard Lifvendhal 20 North Wacker Drive Suite 2100 Chicago, Illinois 60606  <i>Counsel to Defendants Ingram Micro, Inc. and CIM Ventures, Inc.</i>	EMF Core Fund Ltd. c/o Maples & Calder P.O. Box 309, Ugland House South Church Street, George Town Grand Cayman KY1-1104 Cayman Islands
MAYER BROWN LLP  Edward S. Best, Esq. 71 S. Wacker Drive Chicago, Illinois 60606	DLA PIPER  Ronald M. Lepinskas 203 North LaSalle Street, Suite 1900 Chicago, Illinois 60601-1293  <i>Counsel to Defendant Christopher Petitt</i>
GIBSON, DUNN & CRUTCHER LLP  Mitchell A. Karlan 200 Park Avenue New York, NY 10166-0193  <i>Counsel to Defendant Gibson, Dunn &amp; Crutcher LLP</i>	LOCKE, LORD, BISSELL & LIDDELL, LLP  Thomas Justin Cunningham Ronald M. Lepinkas Sally Weiss Mimms Phillip Russell Perdew  111 South Wacker Drive Chicago, IL 60606  <i>Attorneys for Defendant Christopher Petitt</i>

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650 Town Center Drive, 4<sup>th</sup> Floor  
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*Attorneys for Defendant CIM Ventures, Inc.*

Dated: May 23, 2008

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Aaron E. Albert

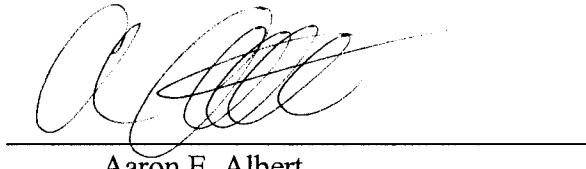
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Costa Mesa, CA 92626  
*Attorneys for Defendant CIM Ventures, Inc.*

Dated: May 23, 2008



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Aaron E. Albert

# Supreme Court of New Jersey



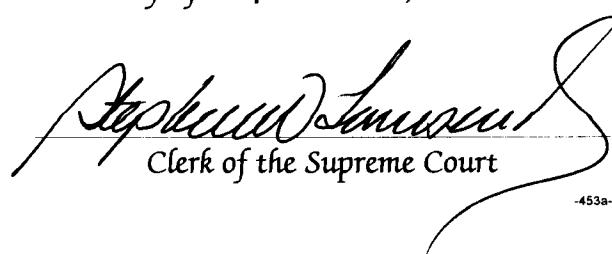
## Certificate of Good Standing

This is to certify that **ALAN C THOMAS**  
(No. **038441987**) was constituted and appointed an Attorney at Law of New Jersey on **December 18, 1987** and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.*

In testimony whereof, I have hereunto set my hand and affixed the Seal of the Supreme Court, at Trenton, this  
23RD day of April , 20 08

  
Stephen J. Munzer  
Clerk of the Supreme Court

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

KENNETH M. KRYS and CHRISTOPHER STRIDE, as Joint Official Liquidators of Sphinx, Ltd.,

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Defendants.

No. 08-Civ. 3065 (GEL)  
No. 08-Civ. 3086 (GEL)

**ORDER FOR ADMISSION  
*PRO HAC VICE* OF  
ALAN C. THOMAS  
ON WRITTEN MOTION**

Upon the motion of Aaron E. Albert, attorney for Defendants Beckenham Trading Company, Inc. and Andrew Krieger, and the affidavit of Aaron E. Albert submitted in support, pursuant to Local Civil Rule 1.3(c);

**IT IS HEREBY ORDERED** that

ALAN C. THOMAS  
Fischer Porter Thomas & Reinfeld, P.C.  
180 Sylvan Avenue, Second Floor  
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Tel: (201) 569-5959  
Fax: (201) 871-4544  
E-mail: athomas@fpmtlaw.com

is admitted to practice *pro hac vice* as counsel for Defendants Beckenham Trading Company, Inc. and Andrew Krieger in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF

password at nysd.uscourts.gov. Counsel shall forward the required \$25 *pro hac vice* fee to the Clerk of the Court.

Dated: \_\_\_\_\_, 2008  
New York, New York

\_\_\_\_\_  
Hon. Gerard E. Lynch, U.S.D.J.